



*South Carolina*  
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May 3, 2021

**VIA ELECTRONIC FILING**

The Honorable Jocelyn Boyd  
 Chief Clerk/Executive Director  
 The Public Service Commission of South Carolina  
 101 Executive Center Drive  
 Columbia, South Carolina 29210

RE: Docket 2020-247-A  
 Workshops Regarding the Public Service Commission's Formal Review of Its  
 Regulations Pursuant to S.C. Code Ann. Section 1-23-120(J)  
**Comments on Water and Sewer Terminations and Applications**

Dear Ms. Boyd:

The Department of Consumer Affairs (the "Department") submits this letter in response to the Commission's request for comments on regulations 103-535.1 and 103-735.1 regarding termination of service, and 103-512.4 and 103-712.4 regarding rate applications. In addition, we plan to participate in the May 12, 2021 workshop.

The Department previously submitted comments in this docket related to the general filing requirements in 103-800 et seq. and the Commission staff's proposed Minimum Filing Requirements ("MFRs"). Our comments were reiterated in the workshop related to water and sewer regulations generally. To be brief, four recommendations from the prior comments are also applicable to the current review of sections 103-512.4 and 103-712.4 (Rate Applications):

- 1) A company should file direct testimony at the same time as its application.
- 2) A company should submit all supporting documents with its application.
- 3) The Commission should require uniform schedules
- 4) All pleadings and testimony should be in word or searchable pdf format, as applicable.

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As noted in our prior letters and during prior workshops, we agree the MFRs and schedules for water and sewer companies would be different than those for electric and gas companies.

Regarding sections 103-535.1 and 103-735.1, in the prior water and sewer workshop, we noted we strongly disagree with the Southwest Water Company utilities' request to eliminate the 30 day initial notice of disconnection pursuant to sewer regulation 103-531.1 and align it with the 10 day requirement in water regulation 735.1. Instead, we believe the Commission should consider increasing the notice under 735.1 to align it with the 30 day initial notice that under 531.1.

At this time, the Department does not have any additional comments. However, we reserve our right to submit reply comments in accordance with the Commission's notices in this docket. We appreciate the time and effort the Commission staff have put into the regulation review process, as well as the comments submitted by other parties. We look forward to continuing to address these important matters.

Regards,

A handwritten signature in blue ink, appearing to read "Roger Hall".

Roger Hall, Esq.  
*Deputy Consumer Advocate*